

## **EXHIBIT 1**

### **Proposed Order**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Durham Division**

VICTOR VOE, *et al.*,

*Plaintiffs,*

*v.*

THOMAS MANSFIELD, *et al.*,

*Defendants.*

Civil No. 1:23-cv-864

**[PROPOSED] ORDER AUTHORIZING PLAINTIFFS VICTOR VOE,  
VANESSA VOE, AND VANCE VOE TO PROCEED PSEUDONYMOUSLY**

This matter came before the Court on Plaintiffs’ Victor Voe’s, Vanessa Voe’s, and Vance Voe’s (together, the “Movants”) motion for permission to proceed in this action under pseudonyms.

Having considered the Movants’ motion and supporting memorandum, the Court finds there is good cause to grant Movants’ motion and hereby **ORDERS:**

1. Movants may proceed in this action under the pseudonyms “Victor Voe,” “Vaness Voe,” and “Vance Voe.” Movants’ counsel shall disclose Movants’ true names and, to the extent otherwise discoverable under the Federal Rules of Civil Procedure, other information that identifies Movants or Movants’ family members, directly or indirectly (“Identifying Information”), upon request to Defendants’ counsel and the Court.

2. All publicly-filed documents shall identify Movants only by Movants' pseudonyms.

3. All documents filed with the Court that contain Movants' name or Identifying Information shall be redacted or filed under seal.

4. Defendants' counsel may disclose Identifying Information to Defendants, Defendants' employees, and experts retained in this action, but only to the minimum extent necessary to litigate this action.

5. Individuals to whom Identifying Information is disclosed shall not further disclose that information to any other person without first obtaining written confirmation from Movants' counsel that such disclosure is necessary to litigate this action.

6. Under no circumstances shall any person disclose Identifying Information to the media without the express written consent of Movants' counsel.

7. Before disclosing Identifying Information to any person for purposes of litigating this action, Defendants' counsel shall give that person a copy of this order, require that person to read this order, specifically point out to that person the provisions of section 6 and 7 of this order, and specifically warn that person that violation of this order may result in sanctions for contempt of court.

8. If any specific issues related to non-disclosure of Identifying Information arise during the course of litigation, the parties shall seek to resolve those issues without court intervention. If the parties cannot agree, they shall seek further clarification from this Court.

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[Magistrate] [District] Judge